

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

**DAIRYLAND INSURANCE
COMPANY,**

Plaintiff,

vs.

Case No. : 3:07-CV-263

**DIXIE LEONARD JOHNSON,
DUSTIN E. SIMPSON, and
TENNESSEE FARMERS MUTUAL
INSURANCE COMPANY,**

Defendants.

MOTION FOR DEFAULT JUDGMENT

Comes Dairyland Insurance Company (hereinafter referred to as "Dairyland"), by and through the undersigned counsel, and requests the Court, pursuant to Federal Rule of Civil Procedure 55(b)(2), enter a judgment by default against defendant Dustin E. Simpson. In support of this request, Dairyland relies upon the record in this case and the affidavit attached hereto.

Respectfully submitted,

**BAKER, O'KANE,
ATKINS & THOMPSON**

/s/ Michael K. Atkins
MICHAEL K. ATKINS, BPR# 017862
P.O. Box 1708
Knoxville, Tennessee 37901-1708
(865) 637-5600
(865) 637-5608 (fax)

**Attorney for Plaintiff Dairyland
Insurance Company**

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2007, a copy of the foregoing Motion for Default Judgment was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Michael K. Atkins

MICHAEL K. ATKINS

BPR#0017862

2607 Kingston Pike, Suite 200

P.O. Box 1708

Knoxville, TN 37901-1708

(865) 637-5600